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MEMO ENDORSED

March 12, 2008

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CONNECTICAT

VIA FACSIMILE (212.805.6326)

The Honorable Colleen McMahon United States District Court Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 640 New York, NY 10007

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EEOC v. Tavern on the Green Ltd. P'ship, 07 Civ 8256 (CM) (AJP) Re:

MINIANA

Dear Judge McMahon:

This firm represents the Defendant Tavern on the Green Limited Partnership ("Tavern on the Green") in the above-referenced matter. I write on consent of all parties to respectfully request a stay of discovery in this matter until April 14, 2008, pending settlement discussions and mediation between the parties.

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MASSACHURRETTS

MISSORI

The proposed stay would affect the following scheduled dates: Depositions, scheduled to commence on March 24, 2008; Plaintiff's expert report due on April 4, 2008; Defendant's expert report due on May 2, 2008; the date for completion of discovery on May 16, 2008; and the due date for the joint-pretrial order on June 13, 2008. As such, the parties respectfully propose extending the above dates as follows: Depositions to commence on April 14, 2008; Plaintiff's expert report to be due May 2, 2008; Defendant's expert report to be due May 30, 2008; the date for completion of discovery to June 13, 2008, and the due date for the jointpretrial order to July 11, 2008.

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The parties have previously made one request for an extension of time regarding the deadlines for expert reports, completion of discovery, and the joint-pretrial order, which was of the frank endorsed by the Court on February 25, 2008.

OKŁĆON

OHIO

LENUSATAVNI V

KITODE (SLAN)

ZOUTH CHICHMAN

TREAM

Hon. Andrew J. Peck (via facsimile 212.805.7933)

Kam S. Wong, Esq. Derek Wolman, Esq.

Respectfully,

cc:

A. Michael Weber

THE NATIONAL EMPLOYMENT - LABOR LAW FIRM

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